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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE LEHMAN BROTHERS HOLDINGS, INC.  
DERIVATIVE LITIGATION

ECF Case  
Case No. 07-cv-2990 (DAB)

**NOTICE OF INDIVIDUAL  
DEFENDANTS' MOTION TO DISMISS**

**PLEASE TAKE NOTICE** that, upon the annexed Declaration of John M. Callagy, dated March 4, 2008, and the exhibit annexed thereto, and accompanying Memorandum of Law, and the pleadings herein, Defendants Richard S. Fuld, Jr., Michael L. Ainslie, John F. Akers, Roger S. Berlind, Thomas H. Cruikshank, Marsha Johnson Evans, Sir Christopher Gent, Roland A. Hernandez, John D. Macomber, Jeremy Isaacs, Bradley H. Jack, Henry Kaufman, Michael F. McKeever, Dina Merrill, Jeffrey Vanderbeek, Jonathan Beyman, John L. Cecil, David Goldfarb, Joseph M. Gregory, Christopher O'Meara, and Thomas A. Russo (collectively, the "Individual Defendants"), by their counsel, Kelley Drye & Warren LLP, will move this Court before the Honorable Deborah A. Batts, at the United States Courthouse, 500 Pearl Street, Courtroom 24B, New York, New York, on a date and time to be determined by the Court, for an order pursuant to Federal Rule of Civil Procedure 12, granting the Individual Defendants their motion to dismiss

Plaintiffs' Verified Consolidated Shareholder Derivative Complaint, and awarding the Individual Defendants such other, further, and different relief as this Court deems to be just and proper.

DATED: New York, New York  
March 4, 2008

Respectfully submitted,

KELLEY DRYE & WARREN LLP

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